

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CRISTA S. FOREST,

Plaintiff,

Case No.: 1:23-cv-02925

v.

Judge John Robert Blakey

THE PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON SCHEDULE "A",

Magistrate Judge Jeffrey I. Cummings

Defendants.

PLAINTIFF'S MOTION TO EXCEED PAGE LIMITATION

Plaintiff, CRISTA S. FOREST ("Plaintiff"), by and through Plaintiff's undersigned counsel, respectfully requests that Plaintiff be given leave to file Plaintiff's brief in support of Plaintiff's *Ex Parte* Motion for Entry of a Temporary Restraining Order in excess of 15 pages. As part of the TRO, Plaintiff seeks: (1) a temporary injunction against Defendants enjoining the manufacture, importation, distribution, offering for sale, and sale of Infringing Crista S. Forest Products; (2) a temporary restraint of Defendants' assets to preserve Plaintiff's right to an equitable accounting; (3) expedited discovery allowing Plaintiff to inspect and copy Defendants' records relating to the manufacture, distribution, offering for sale, and sale of Infringing Crista S. Forest Products and Defendants' financial accounts; and (4) service by electronic mail and/or electronic publication (collectively, the "*Ex Parte* Motion for TRO"). Plaintiff's *Ex Parte* Motion for TRO includes four (4) distinct issues regarding Plaintiff's intellectual property rights, each of which must be decided simultaneously. Plaintiff's brief contains necessary substantive content relevant to each issue that should be considered. Plaintiff's brief is less than 25 pages, which is substantially less than the 60-page limit allowed if four motions were filed separately. Plaintiff, therefore, respectfully requests

that Plaintiff be granted leave to file a combined brief in excess of 15 pages for purposes of efficiency.

DATED: May 10, 2023

Respectfully submitted,

/s/ Keith A. Vogt

Keith A. Vogt (Bar No. 6207971)

Keith Vogt, Ltd.

33 W Jackson Boulevard, #2W

Chicago, Illinois 60604

Telephone: 312-971-6752

E-mail: keith@vogtip.com

ATTORNEY FOR PLAINTIFF